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May 23, 2023

Via E-mail Only

Honorable Gerald J. Pappert
Chambers of Judge Pappert@paed.uscourts.gov
U.S. District Court for the Eastern District of Pennsylvania
James A. Byrne United States Courthouse
11614 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

RE: Byfield, et al. v. Healthcare Revenue Recovery Group, LLC
Zhyriada v. Healthcare Revenue Recovery Group, LLC
U.S. District Court for the Eastern District of Pennsylvania
Docket Nos. 18-cv-243, 19-cv-5703

Dear Judge Pappert:

As Your Honor may be aware, this office represents Hermine Byfield and Iryna Zhyriada (collectively, "Plaintiffs") in the above-referenced matters that were originally litigated as "related" before the Hon. Petrese B. Tucker. I write on behalf of all parties and counsel regarding the oral argument scheduled in the Byfield matter for May 25, 2023. See ECF Byfield Doc. 77.

Byfield and Zhyriada involve similar allegations that a "dunning" letter from Healthcare Revenue Recovery Group, LLC ("Defendant") violates the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. In both cases, Defendant sought summary judgment with analogous arguments (albeit through different counsel). See ECF Byfield Doc. 57; ECF Zhyriada Doc. 16. For this reason, Your Honor's earlier disposition of Defendant's request for summary judgment in the Zhyriada matter (after oral argument on April 26, 2023) affects both cases. In Zhyriada, the Court referred the parties to Magistrate Judge Elizabeth Hey for a settlement conference. See ECF Zhyriada Doc. 35. However, no such referral exists for Byfield.

The parties strongly believe that a joint settlement conference for Byfield and Zhyriada, before the same arbiter, would be substantially more effective than piecemeal negotiation over

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only one of the two cases. Accordingly, we ask that Your Honor also refer Byfield for a settlement conference with Judge Hey. Additionally, to avoid unnecessary expenditure of time and resources, the parties ask that oral argument in Byfield be postponed until we had an opportunity to appear before Judge Hey. The parties are well aware of the deadlines set by Your Honor in Zhyriada and will move expeditiously to conduct a settlement conference to avoid any rescheduling.

If Your Honor has any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to be 'ER' followed by a stylized flourish.

Arkady "Eric" Rayz, Esquire

ER/tp

cc: All Counsel of Record
Via E-mail Only